

Exhibit H

James Halpin

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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In Re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X

GERARD PATRICK AHEARN, et al.,

**AFFIDAVIT OF
JAMES HALPIN**

Plaintiffs,

20-CV-00355 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X

STATE OF NEW YORK)
 : SS.:
COUNTY OF BRONX)

JAMES HALPIN, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 3333 Henry Hudson Parkway, 18C, Bronx, NY 10463.

2. I am currently 36 years old, having been born on July 28, 1985.

3. I am the son of John James Halpin, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. My father passed from bronchial asthma on May 29, 2014. It was medically determined that his illness was causally connected to his exposure to the toxins resulting from the September 11, 2001 terrorist attacks.

5. My father was a huge part of my life. We did everything together. We loved sports, and he was there at all of my football games growing up. We were Irish football fanatics, and he would always take us to Ireland to watch the finals. I would often go with him to FDNY functions and parties. He was an athlete his whole life and loved running. He was a very strong guy, very healthy, and always took care of himself.

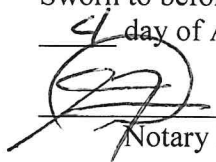
6. My father was part of the FDNY Search and Rescue team. He responded to the World Trade Center site on September 11, 2001. He searched through the rubble for survivors, and later for bodies and body parts. He would be gone for two days at a time. I remember him coming home for the first time after 9/11. He was covered in soot and bleeding from his face, I'll never forget that. I never respected someone so much. He was down there at Ground Zero for a six-month search and recovery detail.

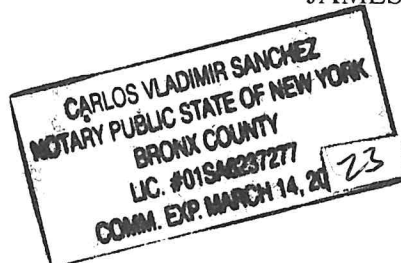
7. Every year my father would go through an FDNY physical exam. In 2005, his physical exam started to show that he was having trouble breathing. He was constantly coughing. In 2006, he took medical leave for COPD and coughing. I noticed a decline in his health over time. He had skin cancer on his right thumb and had to have it amputated in 2010. Around 2012, he was diagnosed with throat cancer. He was sick for years. It was very hard to watch him go like that. I couldn't imagine the pain he was going through. He was a very strong man and never complained. It was so difficult seeing someone who you respect so much decline and become so sick.

8. As his illness progressed, I would help my father out with physical tasks that he could no longer do. Shoveling, mowing the lawn, moving furniture. I did whatever I could to help, but I wasn't living with him at the time. When he died, it was such a great loss. We had such great times together, and all those great times were wiped away by his illness. Everything changed after he got sick, and since he passed, nothing has or will ever be the same.


JAMES HALPIN

Sworn to before me this
4 day of April, 2022


Notary Public



John C. Halpin

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
In Re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X
GERARD PATRICK AHEARN, et al.,

**AFFIDAVIT OF
JOHN C. HALPIN**

Plaintiffs,

20-CV-00355 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X
STATE OF NEW YORK)
 : SS.:
COUNTY OF BRONX)

JOHN C. HALPIN, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 3671 Hudson Manor Terrace, Bronx, NY 10463.

2. I am currently 39 years old, having been born on January 15, 1983.

3. I am the son of John James Halpin, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. My father passed from bronchial asthma on May 29, 2014. He also had throat cancer. It was medically determined that his illnesses were causally connected to his exposure to the toxins resulting from the September 11, 2001 terrorist attacks.

5. My father and I did everything together. He was my best friend. We spoke on the phone multiple times a day. There was a certain security in having him there. We were very, very close. He was a very healthy, active, vibrant person. He loved to laugh. He could command a room. Looking back, I took his health for granted. I miss the times before his illness. There was a stark difference before and after he got sick.

6. He responded to the World Trade Center site on September 11, 2001. He got there with the FDNY after the second tower collapsed. At that point, they were hopeful to find survivors. As time went on, they started realizing that it was going to more of a recovery. There weren't going to be as many survivors as they hoped. He had so many friends and coworkers there. He dug through the rubble, searching voids below the collapse. He was there all the time for months. He went from Ground Zero, back to the firehouse, to Ground Zero again. He was committed to working at the site—he was searching for friends.

7. We could see him wheezing. He began to have asthma soon after 9/11. I noticed his respiratory distress and watched his breathing get worse. Watching him deteriorate and quietly suffer was the hardest. You would see him physically struggle, but he would never say anything. Over time, he became more and more quiet because he couldn't breathe. It was hard for him to even laugh, because laughing would cause him to cough. It was very difficult to watch, because it's the most helpless feeling in the world. I saw him struggle to climb stairs, struggle to speak, even struggle to talk on the phone. He would get short of breath while we talked on the phone, and he'd put the phone to his chest so I couldn't hear him wheeze.

8. I distinctly remember when he called me to say he had throat cancer. That was in 2013. He was at work when he called me, and I was so shocked by the news that I started sobbing. He started crying, too. He underwent radiation for his throat cancer. That's when I realized things were getting a lot worse. He couldn't do the things he used to be able to do. He needed help with simple daily tasks, even just climbing the stairs. I helped him out with work around the house, yard work, and shoveling the driveway. He didn't want to ask for help, but I knew he needed it.

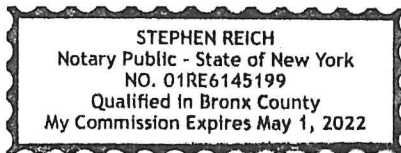
9. Knowing that I lost so much time with him, that's the greatest thing I struggle with. He wasn't there to see me get married. I have one child and another one on the way, and they will never be able to meet him. My siblings and I all got married, and he wasn't here to go to any of them. My sisters never had their father walk them down the aisle. Even if he was around today, he'd still be young. People his age run marathons. Those major milestones, and even the little things, will never happen. I wish I could go back and have five minutes with him. It's hard to realize that will never happen.

10. So many families were impacted by 9/11. When you're in the 9/11 community, it never ends. Someone gets sick or dies every day. Even though my father struggled with illness and died an unpleasant death, he did a noble deed. If it happened again tomorrow, he would go right back down to the World Trade Center site and do what he had to do.


JOHN C HALPIN

Sworn to before me this
4th day of April, 2022


Notary Public



Marylin Halpin

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
In Re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X
GERARD PATRICK AHEARN, et al.,

AFFIDAVIT OF
MARILYN HALPIN

Plaintiffs,

20-CV-00355 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X
STATE OF NEW YORK)
 : SS.:
COUNTY OF ORANGE)

MARILYN HALPIN, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 55 Jones Drive, Highland Mills, NY 10930.

2. I am currently 66 years old, having been born on June 29, 1955.

3. I am the wife of John James Halpin, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. My husband passed from chronic bronchial asthma on May 29, 2014. He was only 61 years old. It was medically determined that his illness was causally related to his exposure to the toxins resulting from the September 11, 2001 terrorist attacks.

5. We were very social. We did a lot of cultural events, events with the Fire Department, and we were always at the beach. We loved spending time with our 4 kids, and we did lots of activities with them. We also traveled often. He loved Irish football, running, and swimming in the ocean. We loved to socialize and be with our children and friends.

6. I know he went down to the World Trade Center site on the morning of September 11, 2001. He was on site for days before coming home. He was there all the time—

he would go from Ground Zero, to the firehouse, then straight back to Ground Zero. John was a Lieutenant, and he and his team were there for months on end. He was digging in the pile, sometimes searching under the pile. In the beginning, they were searching for survivors. As time went on, it became more of a recovery mission. He didn't tell me much about it. Once in a while, something very grizzly would come up in conversation, like the way he would find a body part, or see a waxy yellow bone sticking out of the rubble. The firemen were especially emotional when they found the bodies of dead women in the pile. He was just so, so distraught and devastated by it all. His heart was broken.

7. I noticed within a few years after 9/11 that John had shortness of breath. I noticed him coughing and wheezing a lot starting in 2005. He couldn't do anything that he used to do, and he couldn't breathe without an inhaler. His activities with the kids stopped. His condition worsened over time. This was a man who had never been sick before 9/11. He didn't have a cold in his life, he never even took a Tylenol. He was so healthy; he never ate sweets. He was a very healthy person before the start of his illness. But he underplayed everything, because he didn't want to worry me and the kids.

8. I would say in 2013 his conditioned really started to decline. He had a bleeding thumb from skin cancer that was causing him so much pain that it had to be amputated. That was also the year when he was diagnosed with throat cancer. He couldn't talk for long periods. He always had to clear his throat and had a raspy voice. That turned into difficulty speaking. He underwent radiation in February 2013 at Sloan Kettering for the throat cancer. That Easter, he was in so much pain and he didn't look healthy anymore. His throat was so sore that his shirts couldn't touch his neck. Otherwise, they'd cause him pain.

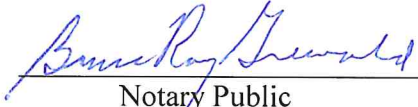
9. Everything changed. He was a different father once he became ill. He was more distant. He always tried to keep up a brave front and be encouraging, but we knew he was declining rapidly because he wasn't able to do things he wanted to do. He couldn't play music anymore, he couldn't go out, and it was hard for him to breathe. He once collapsed at a funeral because was short of breath. It was devastating to know that his illness was robbing him of the things he loved. I know he didn't like feeling weakened or being incapacitated, and I didn't like to see him that way. We knew he was dying, and it was heartbreaking to watch.

10. I felt like I couldn't leave him alone for more than a little while. I was watching him disappear in front of my own eyes. He was the rock of the family, our financial breadwinner, and the head of our household. He was a leader. I was worried about what life would be like without him. I buried a lot of those feelings, because he put on a brave face for me. But sometimes it felt like watching a ghost. I was his primary caretaker, and I saw it all happen. Still, even towards the end, he was very proud. He wouldn't let you help him that much. When he passed, it was a tremendous loss for my children and me.

11. My husband was taken from me and my children. He didn't get a chance to live and see the fruit of his labor. He worked hard as a firefighter. He was a good, kind, honest, and selfless man. It saddens me to think that his grandchildren will never know him. He was fair, brave, and good. He only wanted what was right.


MARILYN HALPIN

Sworn to before me this
6th day of April, 2022


Notary Public
BRUCE ROY GREENWALD
NOTARY PUBLIC, State of New York
No. 03-6659215
Qualified in Bronx County
Commission Expires Oct. 31, 2022

Virginia O'Shaughnessy

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X

In Re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X

GERARD PATRICK AHEARN, et al.,

**AFFIDAVIT OF
VIRGINIA O'SHAUGHNESSY**

Plaintiffs,

20-CV-00355 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X

STATE OF NEW YORK)

: SS.:

COUNTY OF BRONX)

VIRGINIA O'SHAUGHNESSY, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 2600 Netherland Avenue, Apt 2904, Bronx, NY 10463.

2. I am currently 31 years old, having been born on June 7, 1990.

3. I am the daughter of John James Halpin, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. My father passed from bronchial asthma on May 29, 2014. His illness was due to his exposure to the toxic air that resulted from the 9/11 attacks.

5. We were very close. My father was very involved in my life. We loved to go to the beach together. Every summer, we went as a family to Long Beach Island. We would kayak and swim together. He was a very strong and active man. He was a strong swimmer, and I was so scared of the ocean. He was the only person that I could swim with in the ocean. I knew he would always save me. I haven't been in the ocean since he passed.

6. The morning of September 11, 2001, my dad immediately responded to the World Trade Center site. He was there constantly, digging, searching the site. He was searching for friends in the rubble. His best friend in the FDNY went missing in the rubble. Eventually, they were just looking for remains. I know it was traumatic for him to have gone through that every day.


7. I was young when my dad started to get sick. We noticed a few years after 9/11 that his health was worsening. He was on the highest dose of the Advair inhaler for his asthma and COPD. The winter was the worse for him. He could barely breathe when it got cold out, and he had this horrible wheezing cough. Every time he went into a coughing fit, I was afraid he was going to take his last breath. He later had skin cancer and had to get his thumb amputated. He was diagnosed with throat cancer and underwent radiation to try and shrink the tumor. We noticed his friends in the FDNY getting sick too, and they all responded to the World Trade Center. We connected the dots.

8. Emotionally, it was very difficult. We knew he was dying, and we could see it happening before our eyes. We were just waiting for it to happen. It was hard to live with that reality. He was very weak after his radiation treatment. He couldn't do the things that he used to love to do, like go running or play accordion. He was a skilled musician, but once he lost his thumb, he couldn't play the accordion anymore. It was just heartbreaking. His funeral was on my 24th birthday. It was the most surreal and awful experience.

9. I think about the time I lost with my father. He wasn't there to walk me down the aisle at my wedding. He never even met my siblings' spouses. I married his childhood best friend's son. I just had a baby that he will never get to meet. He could have shared a grandchild with his best friend, and I know he would have loved that. It's hard to think about that. He never saw me excel in my career. He missed out on the most wonderful parts of my life. He was robbed of a rite of passage. If it wasn't for 9/11, he would've been here and wouldn't have had to miss a thing.

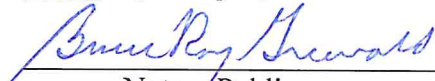
10. The events following 9/11 affected not just me, but also my family's life today and for generations. We will never forget the stress of his illness and death. We never got to say goodbye, he was just gone. Our children and grandchildren will never get to meet him. He was

the rock of the family. Everyone went to him for advice. There's a huge void in our lives now that he's not here, and we think of him every day.



VIRGINIA O'SHAUGHNESSY

Sworn to before me this
6th day of April, 2022



Notary Public

BRUCE ROY GREENWALD
NOTARY PUBLIC, State of New York
No. 03-6659215
Qualified in Bronx County
Commission Expires Oct. 31, 2022

Jasmine LaGreca

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
In Re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X
GERARD PATRICK AHEARN, et al.,

**AFFIDAVIT OF
JASMINE LaGRECA**

Plaintiffs,

20-CV-00355 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X
STATE OF PENNSYLVANIA)

: SS.:

COUNTY OF MONROE)

JASMINE LaGRECA, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 746 Garnet Lane, East Stroudsburg, PA 18301.

2. I am currently 60 years old, having been born on September 19, 1961.

3. I am the wife of Robert LaGreca, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. My husband died from lung cancer on July 30, 2016. It was determined by the World Trade Center Health Program that his illness was causally connected to his prolonged exposure to the toxins caused by the 9/11 terrorist attacks.

5. Bobby was my best friend, we did everything together. We had a simple life, but it was our life. I miss my life with him. The life that I have now is nothing compared to what it was before. We did everything together, shoveling the snow, going out to dinner, everything. Everything that we did was simple and beautiful. He was a really sweet person.

6. Bobby was at work in Manhattan on September 11, 2001. He was in NYC Department of Sanitation office and had gone up to the roof. When he got to the roof, he saw

the second plane hit the South Tower. He called me right away. He was shaken by what he was seeing. At first, I didn't understand what he was talking about because all he was saying was, "the plane hit the building! It hit the building!" We lost our phone connection. I put on the television news and figured out what happened. I was in a panic. I immediately contacted my brother-in-law, who took me to pick up my children from school.

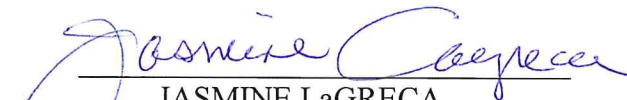
7. Bobby was there every single day for the clean-up. He didn't miss a day for months. For 9-10 months, he was there every day and put in a lot of overtime. I remember him talking about the stench, the smell, and the things he saw in the rubble.

8. I first came to learn of Bobby's cancer on Labor Day 2015. He confessed that he was peeing blood, and it was a lot of blood. We went to the urologist, and they did some tests on him. About six weeks later, on Columbus Day weekend in 2015, the urologist told us it was lung cancer. He went for his first round of chemotherapy on November 18, 2015. They gave us a prognosis that we thought was okay at the time. They thought it would be 6 to 9 months of chemotherapy and he'd be able to beat it. But things started going wrong.

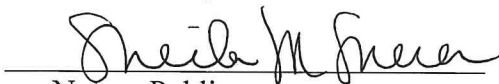
9. I've always worked at the same place, and I didn't have a high income. I was very dependent on Bobby at that time. I had to take FMLA to take care of him. We had to put him in a nursing home, and they had to lift him out of the bed with a machine. My daily life was a nightmare. I screamed and cried a lot. I was angry all the time...it wasn't fair. My paycheck helped us to live but I was losing my house. Even the copays on his medication were \$400-\$500 a month. I turned from an independent person to someone dependent on my children. I thought I'd have a nervous breakdown. You lose all sense of balance. When we were losing the house, the lawyers in the foreclosure were really rough. They were harassing my children, sending them legal notices and telling them they'd have financial responsibility. It was just a real horror.

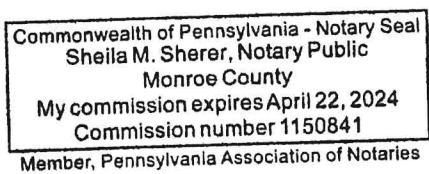
10. Bobby didn't die on 9/11, but he is just as important as the people who did. If it wasn't for the cancer, he would be here right now. There has to be accountability for what Bobby, and our family, went through. We have five children and 8 grandchildren. Holidays were the best. We don't have that no more and it's not fair. The life that I had before Bobby got sick was a good, happy life. Bobby mattered, his life mattered. And just because he didn't die on

9/11 doesn't mean that he, and we, didn't suffer. Ours was a prolonged agony.


JASMINE LaGRECA

Sworn to before me this
5 day of April, 2022


Notary Public



Erica Quartararo

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X

In Re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X

GERARD PATRICK AHEARN, et al.,

AFFIDAVIT OF
ERICA QUARTARARO

Plaintiffs,

20-CV-00355 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X

STATE OF PENNSYLVANIA)
 : SS.:
COUNTY OF NORTHAMPTON)

Erica Quartararo, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 426 West Berwick Street, Easton PA, 18042.

2. I am currently 29 years old, having been born on February 22, 1993.

3. I am the stepdaughter of Robert LaGreca, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. My stepfather died from lung cancer on July 30, 2016. It was determined by the World Trade Center Health Program that his illness was causally connected to his prolonged exposure to the toxins caused by the 9/11 terrorist attacks.

5. I am the youngest of all my siblings, so I knew Bobby [Robert] my whole life. He was my stepfather, but really, he was like my dad. He taught me how to drive a car. He took the role that my father should have taken. He cheered me up when I was crying, always gave me advice, and he was always there for us. We were his kids.

6. I was only 8 years old on September 11, 2001. Bobby didn't come home until later at night. He was onsite, working late nights for months. He was actively involved in the

cleanup. It was such a disaster.

7. I lived at home at the time when Bobby started to get sick. He went to the doctor, no one really said anything. I came home one day from a friend's house to find my mom hysterically crying, saying Bobby has cancer. All of a sudden, it was Stage IV, in the blink of an eye, and he wasn't who he used to be.

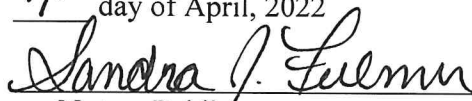
8. It was just so miserable. I lived with my mom when Bobby was sick. I had seen him when he started chemotherapy until the time he couldn't use his legs. He was crying how he was in pain, and how he needed help. I saw everything deteriorate; my mom was crying every day. We moved into a small townhouse because we lost our home. He couldn't even get on the bus to the hospital because he couldn't walk, and we couldn't lift him onto the bus.

9. Financially, we lost our home—we lost everything. I was in college at the time, and I was working full-time. I would miss work and skip classes to come home and help out Bobby. Someone had to be there at all times to help.

10. I lost my whole adulthood life with Bobby. I'm getting married next year. He's never going to walk me down the aisle. He'll never meet my kids one day. I miss the life that I won't get to experience with him.


ERICA QUARTARARO

Sworn to before me this
7th day of April, 2022


Notary Public

Commonwealth of Pennsylvania - Notary Seal
SANDRA J FULMER - Notary Public
Northampton County
My Commission Expires September 8, 2025
Commission Number 1251818

Jennifer Quartararo

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
In Re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X
GERARD PATRICK AHEARN, et al.,

**AFFIDAVIT OF
JENNIFER QUARTARARO**

Plaintiffs,

20-CV-00355 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X
STATE OF PENNSYLVANIA)
 : SS.:
COUNTY OF MONROE)

JENNIFER QUARTARARO, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 1809 Douglas Avenue, Stroudsburg PA 18360.

2. I am currently 38 years old, having been born on October 31, 1983.

3. I am the stepdaughter of Robert LaGreca, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. My stepfather died from lung cancer on July 30, 2016. It was determined by the World Trade Center Health Program that his illness was causally connected to his prolonged exposure to the toxins caused by the 9/11 terrorist attacks.

5. My mom, Jasmine LaGreca, married Bobby [Robert] when I was 12 years old. At the time of his passing, he had been in my life for more than 15 years. I lived in his home and raised my daughter in his home. He was in our everyday lives. He was more than a stepfather, he was in every sense of the word, my father.

6. Bobby worked for the NYC Department of Sanitation, and he was there on September 11, 2001. He was there for months and months following 9/11 for the cleanup. He

came home in the early morning hours of September 12th and returned to work almost immediately. He was at the World Trade Center site without coming home for many, many days.

7. In September of 2015, Bobby hadn't been feeling well and went for a checkup. We found out that he had lung cancer.

8. Emotionally, it took a toll on our entire family from him being so sick. We lost our family home to a foreclosure. Within 9 months, he went from a fully functional active older adult to being a paraplegic in his last days. He lost function in his legs, and, within a few weeks, he passed away.

9. As far as time is concerned, we all helped out with driving my mom and dad around. My mom couldn't even drive so we helped her there. We helped out with tasks around the home because Bobby couldn't do them anymore.

10. It was the most horrible experience that our family has ever had. We've never had someone so close to us suffer and die, it took a great toll. We lost our home. He was a huge part of our lives. He's missing out on his grandchildren. It has had a huge impact to us.


JENNIFER QUARTARARO

Sworn to before me this
9th day of April, 2022


Notary Public

Commonwealth of Pennsylvania - Notary Seal
Ashley D. Miralith, Notary Public
Monroe County
My commission expires June 4, 2025
Commission number 1396616
Member, Pennsylvania Association of Notaries

Leonard Quartararo

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
In Re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X
GERARD PATRICK AHEARN, et al.,

**AFFIDAVIT OF
LEONARD QUARTARARO**

Plaintiffs,

20-CV-00355 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X
STATE OF PENNSYLVANIA)
 : SS.:
COUNTY OF MONROE)

LEONARD QUARTARARO, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 198 Melmar Drive, Stroudsburg, PA 18360.

2. I am currently 35 years old, having been born on January 1, 1987.

3. I am the stepson of Robert LaGreca, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. My stepdad died from lung cancer on July 30, 2016. It was determined that his cancer was caused by his exposure to the toxic air in lower Manhattan resulting from the 9/11 terrorist attacks.

5. Bobby, as we called him, was in our lives from childhood. He was my basketball coach, baseball coach for Little League, pretty much everything. My biological father had some serious issues, so Bobby was like my true father figure. Prior to him getting ill, he was involved in everything in our lives. Bobby co-signed all of my student loans for college. I lived in his house for years until I graduated college. I became a father at a young age, and I continued to live in Bobby's home with my son when I became a parent. He was more than just a

stepparent—he put a roof over our heads. He would never say no to us. He truly loved us as his own.

6. I remember the day of September 11, 2001 very clearly. We got a fax at school that one of the towers of the World Trade Center had been hit. My mom and uncle came to pick me up from school. My mom was on the phone with Bob when the south tower was hit, until she lost phone service. Bob worked for the NYC Department of Sanitation and was dispatched into the field. He worked crazy amounts of overtime doing cleanup at the World Trade Center. I remember Bobby used to wake up so, so early for work every day. I would be awake at 2:00am playing video games in high school, and Bobby would be getting up for work, because he had to commute from Pennsylvania into New York. I didn't think much of it at the time, but I look back and realize how hard he was working.

7. In about 2015, Bobby had recently retired. He started to not feel well, but he never complained. I remember him one day telling me and my mother that he was urinating blood. We were surprised, because Bobby was really in shape and was not a big drinker. We thought maybe he just had an infection. He went for a checkup, and we got the diagnosis of lung cancer. Everyone was just shell shocked. And not only that it was cancer, but it was also late-stage cancer.

8. It was hard to watch him go from a fully functional adult human being to basically being a baby again. He couldn't do simple things like go to the bathroom or eat without assistance.

9. It had a severe emotional impact on me and our family. Fortunately, I was able to take time off from work to help Bobby. My sisters and I pitched in to help Bobby out, like drive him to doctor's appointments, and drive my mother wherever she needed to go because she didn't drive. I remember going to the chemotherapy center and working off of my laptop just trying to do my job and having to help him into the car after his treatments. He was never the type to complain, so when Bobby said he wasn't feeling well you really knew that he was in pain. It was really emotional, really draining.

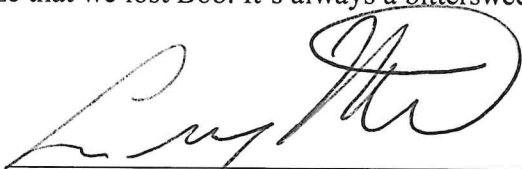
10. Toward the end of his life, Bob lost the ability to use his kidneys. He had nephrostomy bags attached to him, and my mom and I had to learn how to inject saline into him to clean the bags. I remember leaving his house thinking, "how could this have happened?"

Soon after that, he started to lose control of his legs. We had to admit him to a nursing home at 60 years old. It was so hard to watch him sitting all day in a hospital bed, watching TV, surrounded by 80- and 90-year-olds and being the youngest person there.

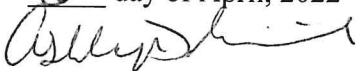
11. Bobby's illness definitely had a negative impact on my work life—the quality of my work and the timing of when I submitted work assignments definitely suffered. Also, shortly after his death, my mom was struggling financially so I helped support her. We lost our childhood home due to foreclosure because it was too much for my mom to maintain and we couldn't pay the difference. It was emotionally and financially draining. It was terrible. I helped my mom with the funeral arrangements, papers, and death certificates. It was like an emotionally draining nightmare right up until he passed away, and even afterwards. It really hit me hard after the fact, because I was in "go" mode for so long. It wasn't until a few months later that I realized Bob was really gone.

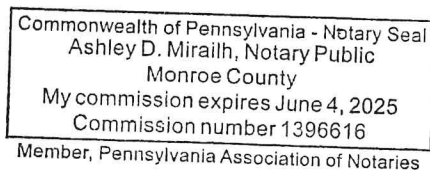
12. Bob gave a speech at my wedding, which I have on video. It's one of the hardest things to watch now, but also one of the best memories I have of him. My wedding was the last time I remember Bobby being healthy. We found out about his diagnosis shortly after I got married. It's a bittersweet memory that I keep with me.

13. Bobby lost his entire adult life. He worked 30 years for the NYC Department of Sanitation. Once he worked 10 years straight without taking a day off, and I remember he received a plaque from Mayor Rudy Giuliani for his service. Bobby met my son when he was very young, and now my son is a teenager. I know Bobby would be proud of the man that my son has become. I have a daughter who is four years old, and he will never know his granddaughter. My daughter was born on the same day that Bobby passed away. So, whenever we celebrate my daughter's birthday, we also realize that we lost Bob. It's always a bittersweet day.


LEONARD QUARTARARO

Sworn to before me this
10th day of April, 2022





Vincent Quatararo

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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In Re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X
GERARD PATRICK AHEARN, et al.,

**AFFIDAVIT OF
VINCENT QUARTARARO**

Plaintiffs,

20-CV-00355 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X
STATE OF VIRGINIA)
 : SS.:
COUNTY OF CULPEPER)

VINCENT QUARTARARO, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 19286 South Merrimac Road, Culpeper, VA 22701.

2. My date of birth is May 15, 1991.

3. I am the stepson of Robert LaGreca, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. My stepfather died from lung cancer on July 30, 2016. It was determined by the World Trade Center Health Program that his illness was causally connected to his prolonged exposure to the toxins caused by the 9/11 terrorist attacks.

5. Although he was my stepfather, I think stepfather is a terrible word. I considered him my father.

6. Bobby was always hands-on; he did everything with us. Between taking us to friend's houses, taking us to school, back and forth to sports practice or work, everything. When Bobby got home from work, his "other job" was to take care of us. He was always on the go with the five of us kids. He taught me how to drive, played catch with me in the front yard,

always cracked jokes with us. The way Bobby raised me taught me how to be involved with my own children.

7. I'm the second-to-youngest child in our family, so 9/11 seems like a long time ago for me. I remember that my mom picked me up from school and told me something bad was happening in New York City. I knew Bobby worked for the Sanitation Department in the city. Bobby was involved in everything at the World Trade Center. He was working there for a long time.

8. My situation is a little different from my siblings, especially since I am not living in Pennsylvania anymore. I knew that Bobby wasn't feeling well and was going to the doctor for a checkup. My mom called me one night and told me that Bobby had cancer. It hit me hard, especially when she said it was Stage IV. I thought to myself, "How could he have gone to the doctor for a normal check-up and come out with Stage IV cancer?"


9. A lot of the emotion for me came because I couldn't help much since I wasn't living at home. I couldn't do anything to help my mom, Bob, or my siblings. That was one of the worst things for me, knowing the stress we were all going through and watching them go through it all from a distance. It was really terrible for me.

10. I now have a young son, who's five years old. He was only a month or two old when Bobby died, so he only got to meet him once. He won't remember anything about Bobby. Bobby sculpted me into the man I am today, and for him not to be around for my son Vincent's life, that really bothers me a lot.

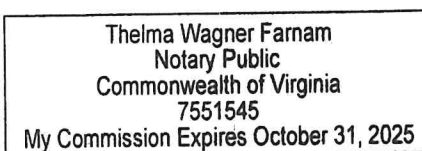


VINCENT QUARTARARO

Sworn to before me this
6th day of April, 2022



Notary Public



Laura Scalercio

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
In Re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X
GERARD PATRICK AHEARN, et al.,

**AFFIDAVIT OF
LAURA SCALERCIO**

Plaintiffs,

v.

20-CV-00355 (GBD)(SN)

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X
STATE OF PENNSYLVANIA)
 : SS.:
COUNTY OF MONROE)

LAURA SCALERCIO, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 2215 Gap View Drive, East Stroudsburg, PA 18301
2. I am currently 36 years old, having been born on October 21, 1985.
3. I am the stepdaughter of Robert LaGreca upon whose death my claim is based and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.
4. My stepfather died from lung cancer on July 30, 2016. It was determined by the World Trade Center Health Program that his illness was causally connected to his prolonged exposure to the toxins caused by the 9/11 terrorist attacks.
5. Bobby was our father figure. He loved being in our lives, and we loved having him. He taught me how to drive and always helped me with my homework. He was also my basketball coach. He came to every event in my life.
6. He was very involved in the clean-up after the September 11th attacks. He worked for the Sanitation Department and worked for months on end at the World Trade Center site.

7. In about 2015, Bobby started to complain that he wasn't feeling well. He was always a very active man, always playing sports. When he started to not feel well, he went for a regular checkup, and that's when we found out that he had lung cancer.

8. It was very emotional for me, and for my whole family. He went from being an active, participating parent, to needing help with everything. He became so weak that he eventually couldn't drive. My mother didn't drive, so we all had to pitch in and take them back and forth to wherever they needed to go. He deteriorated so quickly, lost his personality, he was totally defeated. He fell apart really fast. He seemed to get a little worse each day, and it was devastating to see the change in Bobby right before my eyes.

9. While he was sick, we lost our family home to a foreclosure, so in that way we lost everything. My mom was working but couldn't drive, so we all drove her to work and drove Bobby to his doctor's appointments and to the hospital. We were all working adults with our own families and lives when Bobby got sick. So, we had to drop whatever we were doing when Bobby didn't feel well. He was our priority always. Even when he was in the nursing home, we were always there for him.

10. Bobby died on July 30, 2016. He was everything to our family. He was involved in every aspect in our lives. I have children who will never have the privilege of knowing him. They will grow up without their grandfather and that's just heartbreaking to me. Bobby suffered so horribly in the last couple months of his life. It was awful. He was the most wonderful person you could ever know. I will always be grateful for having had him in my life.

Laura Scalercio
LAURA SCALERCIO

Sworn to before me this
5 day of April, 2022

Alley
Notary Public

